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March 14, 2022

VIA ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*In Re: New York City Policing During Summer 2020
Demonstrations*, 20 Civ. 8924 (CM)(GWG)

Your Honor:

Together with the firm of Schlam Stone & Dolan LLP, I represent the intervenor, The Police Benevolent Association of the City of New York (the "PBA").

The PBA joins in the request made by the City of New York in its letter to you of March 11, 2022 (ECF 448), to the extent of requesting a pause in discovery to enable the PBA to review discovery to date, discuss the case with the other parties, and formulate its own discovery requests. We leave the duration of any pause to Your Honor's discretion.

We assure the Court that the PBA will not duplicate discovery already taken, and will work diligently to meet whatever deadlines the Court imposes.

Respectfully yours,



Robert S. Smith

cc: All counsel of record (via ECF)